IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

REGINA DELILLO,	:
Plaintiff,	:
v.	: CIVIL ACTION
ABRAHAM INDUSTRIES, INC., t/db/a VALLEY FORGE FLAG, INC., et al.	. No. 02-CV-5107
Defendants.	:

DEFENDANTS GREGORY HARRIS' AND SCOTT LIBERMAN'S MOTION TO DISMISS COUNT I OF THE COMPLAINT

TO: Regina DeLillo c/o Debra A. Jensen, Esquire **Galfand Berger LLP** 1818 Market Street Philadelphia, PA 19103-3623

PLEASE TAKE NOTICE that counsel for Defendants Gregory Harris and Scott Liberman shall appear before the United States District Court for the Eastern District of Pennsylvania, 601 Market Street, Philadelphia, PA 19103, on the day of ______, am/pm, or as soon thereafter as counsel may be heard, to move this Court to enter an Order granting their Motion to Dismiss Plaintiff's Complaint with prejudice.

Defendants Gregory Harris and Scott Liberman shall rely on the accompanying Memorandum of Law in support of their Motion to Dismiss Count I of the Complaint.

Respectfully submitted,

BLANK ROME COMISKY & McCAULEY LLP

/s/ Richard S. Meyer RICHARD S. MEYER, ESQUIRE MARGARET A. McCAUSLAND, ESQUIRE JENNIFER J. PLATZKERE, ESQUIRE One Logan Square Philadelphia, PA 19103 (215) 569-5665

Attorneys for Defendants Gregory Harris and Scott Liberman

Dated: September 25, 2002